

EG:RTP

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

14-645 M

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UNITED STATES OF AMERICA

PRE-ARRAIGNMENT
C O M P L A I N T
(21 U.S.C. §§ 952(A)
and 960)

– against –

TAWAKALITU SHIFAT,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

THOMAS WILBERT, being duly sworn, deposes and states that he is a
Special Agent with the United States Department of Homeland Security, Homeland Security
Investigations (“HSI”).

Upon information and belief, on or about July 11, 2014, within the Eastern
District of New York and elsewhere, defendant TAWAKALITU SHIFAT did knowingly,
intentionally and unlawfully import into the United States from a place outside thereof a
substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent’s information and the grounds for his belief are
as follows:¹

¹ Because the purpose of this Complaint is to state only probable cause to arrest, I
have not described all the relevant facts and circumstances of which I am aware.

1. On July 11, 2014, defendant TAWAKALITU SHIFAT arrived at John F. Kennedy International Airport in Queens, New York, aboard Arik flight number 107 from Lagos, Nigeria.

2. Customs and Border Protection (“CBP”) officers approached the defendant for a customs inspection. The defendant presented three checked bags for inspection and stated, in sum and substance and in part, that the bags belonged to her and that she had packed them. During the baggage inspection, the defendant appeared nervous and gave inconsistent answers to questions.

3. CBP officers presented the defendant with an x-ray consent form which the defendant read, appeared to understand and signed. The defendant was transported to the medical facility at John F. Kennedy International Airport for an x-ray examination. An x-ray of defendant’s intestinal tract revealed the presence of foreign bodies. The defendant subsequently passed 12 pellets. One of the pellets was probed and a brown substance was revealed. The substance field tested positive for heroin.

4. Defendant TAWAKALITU SHIFAT will be detained at the JFK medical facility until such time as she has passed all the pellets contained within her intestinal tract.

WHEREFORE, your deponent respectfully requests that the defendant
TAWAKALITU SHIFAT be dealt with according to law.

S/ Thomas Wilbert

Special Agent Thomas Wilbert
Homeland Security Investigations

Sworn to before me this
11th day of July, 2014

S/ Marilyn Go

HONORABLE MARILYN D. GO
EASTERN DISTRICT OF NEW YORK